

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JUAN CONCE,  
a/k/a "KING SANTOS"

Criminal No.

VIOLATIONS:

21 U.S.C. § 846--

Conspiracy to

Distribute Cocaine Base

21 U.S.C. § 841(a)(1)--

Distribution of

Cocaine Base

21 U.S.C. § 853--

Criminal Forfeiture

Allegation

INDICTMENT

COUNT ONE: (21 U.S.C. § 846 -- Conspiracy To Distribute  
Cocaine Base)

The Grand Jury charges that:

In or about April, 2003, at Lawrence, Haverhill and  
elsewhere in the District of Massachusetts,

**JUAN CONCE, A/K/A "KING SANTOS,"**

the defendant herein, did knowingly and intentionally conspire  
and agree with persons unknown to the Grand Jury to possess with  
intent to distribute, and to distribute, a quantity of cocaine  
base, also known as "crack", a Schedule II controlled substance,  
in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further alleges that the conspiracy described  
herein involved at least 5 grams of a mixture or substance

containing a detectable amount of cocaine base, also known as "crack cocaine", a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO:** (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 18 U.S.C. §2 -- Aiding and Abetting)

The Grand Jury further charges that:

On or about April 17, 2003, at Lawrence, in the District of Massachusetts,

**JUAN CONCE, a/k/a "KING SANTOS,"**

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base, also known as "crack cocaine", a Schedule II controlled substance.

The Grand Jury further alleges that the offense described herein involved at least 5 grams of a mixture or substance containing a detectable amount of cocaine base, also known as "crack cocaine", a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION**

**(21 U.S.C. § 853)**

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts 1 through 2 of this Indictment,

**JUAN CONCE, a/k/a "KING SANTOS",**

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants --

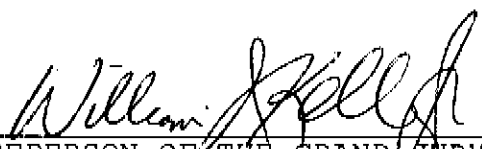
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property

described in paragraph 1.

All in violation of Title 21, United States Code, Section  
853.

A TRUE BILL,

  
FOREPERSON OF THE GRAND JURY

  
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JOHN A. WORTMANN, JR.  
PETER K. LEVITT  
ASSISTANT U.S. ATTORNEYS

DISTRICT OF MASSACHUSETTS

February 19, 2004

Returned into the District Court by the Grand Jurors and  
filed.

  
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Deputy Clerk 12:22P